

**United States District Court**

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<b>SOUTHERN</b>	<b>DISTRICT OF</b>	<b>TEXAS</b>
	MCALLEN DIVISION	

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UNITED STATES OF AMERICA

V.

Humberto Saldana-Gallegos *Principal*

YOB: 1992

Marisol Dominguez-Cortes *Co-Principal*

YOB: 1995

**United States District Court  
Southern District Of Texas**

United States **CRIMINAL COMPLAINT**

Southern District Of Texas

FILED

Case Number:

MAY 2 2019

**M-19-1006-M**

Mexico

David J. Bradley, Clerk

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 30, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,

*(Track Statutory Language of Offense)*

knowing or in reckless disregard of the fact that Jorge Luis Cubas-Palma, a citizen and national of Honduras and Carlos Fabian Moreno-Martinez, a citizen and national of Ecuador, along with six (6) other undocumented aliens, for a total of eight (8), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to-wit; a residence located in McAllen, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii)  
 I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

Border Patrol Agents received information that a residence located in 2513 Flamingo Circle in McAllen, Texas was being used to harbor illegal aliens. Additionally, the source mentioned there was a female caretaker and a male caretaker by the name of Humberto.

On April 30, 2019, Agents, along with deputies from the Hidalgo County Sheriff's Office (HCSO) approached the residence and encountered a female subject, later identified as Marisol Dominguez-Cortes, outside of the house. Cortes stated that she lived at the residence and admitted to be illegally present in the United States. Agents then asked Cortes for consent to search the property, to which she granted verbally and in writing.

**SEE ATTACHED**

Continued on the attached sheet and made a part of this complaint:

Approved by AUSA S. DIPIAZZA 5/2/19 8:12 am

*S. DiPiazza*

Yes  No

Signature of Complainant

**Gerardo Montalvo** **Senior Patrol Agent**

Printed Name of Complainant

May 2, 2019

at McAllen, Texas  
 City and State

J Scott Hacker, U. S. Magistrate Judge  
 Name and Title of Judicial Officer

Signature of Judicial Officer

*J. Scott Hacker*

006 Document 1 Filed on 05/02/19 in TXSD

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF TEXAS**  
**McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

M-19-1006-M

**RE: Humberto Saldana-Gallegos  
Marisol Dominguez-Cortes**

## **CONTINUATION:**

The Agents entered the residence and encountered a male subject, later identified as Humberto Saldana-Gallegos, a United States citizen. Upon searching the rest of the residence, a total of eight subjects were discovered hiding in the closet of a bedroom; the eight subjects were determined to be illegally present in the United States. All subjects were then placed under arrest and transported to the Border Patrol station for processing.

## **PRINCIPAL STATEMENT:**

Humberto Saldana-Gallegos was advised of his Miranda Rights and agreed to provide a sworn statement without an attorney.

Saldana stated that he has resided in his house for about six months. Saldana stated that he walked outside one day and was approached by two male subjects. Saldana stated that after the subjects threatened him, they told him that he was going to work for them by "receiving people". Saldana stated the two male subjects would drop off and pick up illegal aliens to and from his house about once a week. Saldana stated he once received an envelope with \$700-\$1000 (USD) but claims he burned the money because he refused to accept it. Saldana then stated the subjects would instruct him to pick up aliens from other locations, but he stated he would send someone else. Saldana also stated his wife would cook for the aliens.

**CO-PRINCIPAL STATEMENT:**

Marisol Dominguez-Cortes was advised of her Miranda Rights and agreed to provide a sworn statement without an attorney.

Dominguez, a citizen of Mexico, stated she illegally entered the United States in 2013 and has been residing in her house for about six months. Dominguez stated her husband's friend dropped off people at their house so that they can care for them temporarily. Dominguez claimed the friend never came back and they were then threatened by two subjects with guns, who forced her husband to take care of the people. Dominguez stated her husband would get paid for caring for the people in their house but she did not know how much. Dominguez stated that about a week ago, the two armed subjects picked up 11 subjects from her house. Dominguez then stated that an additional eight subjects were dropped off at her house. Dominguez stated she would cook for all the people that were being harbored in her house.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-19-1006-M**

**RE:     Humberto Saldana-Gallegos  
          Marisol Dominguez-Cortes**

**CONTINUATION:**

**MATERIAL WITNESSES' STATEMENTS:**

Jorge Luis Cubas-Palma and Carlos Fabian Moreno-Martinez were read their Miranda Rights and agreed to provide a sworn statement without the presence of an attorney.

Cubas, a citizen and national of Honduras, stated that he crossed the Rio Grande River along with seven other subjects. Cubas stated that his family made his smuggling arrangements and was unsure of the amount of money that was to be paid. Cubas stated that after crossing the river, they got picked up in a vehicle. Cubas stated that they were then taken to a home in McAllen, Texas. Cubas stated there was a male and a female in the house and stated they provided them with food. Cubas stated that he was told by the male subject to hide in the closet on the morning of his apprehension.

Through a photo lineup, Cubas was able to identify Humberto Saldana-Gallegos as the caretaker of the residence who told him to hide in the closet.

Moreno, a citizen and national of Ecuador, stated that he crossed the Rio Grande River along with seven other subjects. Moreno stated he made his smuggling arrangements and was to pay a sum of \$15,000 (USD). Moreno stated that after crossing the river, they were picked up in a vehicle and were taken to the residence where he was arrested in. Moreno stated that they received food and water while they were staying at the house.

Through a photo lineup, Moreno was able to identify Humberto Saldana-Gallegos as the caretaker of the residence.